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January 18, 2017

Via ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 09-197

Madison Communications, Inc.'s Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier

Dear Ms. Dortch:

Madison Communications, Inc. hereby files this Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier pursuant to section 54.202 of the Commission's rules.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Dave Beier

Director of Regulatory and Finance

618-635-5000

dbeier@madisontelco.com

cc: Christian Hoefly, Wireline Competition Bureau - Christian. Hoefly@fcc.gov

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In The Matter of)	
Telecommunications Carriers Eligible to Receive Universal Service Support)))	WC Docket No. 09-197
Madison Communications, Inc.)	
Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier)))	
)	

MADISON COMMUNICATIONS, INC. PETITION FOR STREAMLINED DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER

Madison Communications, Inc. ("Madison" or "Company"), pursuant to section 214(e) of the Communications Act of 1934, as Amended (the Act), 47 U.S.C. § 214(e) and section 54.202 of the Federal Communications Commission's ("Commission" or "FCC") rules, 47 C.F.R. § 54.202, hereby requests streamlined designation as a Lifeline Broadband Provider ("LBP") eligible telecommunications carrier ("ETC") in the proposed designated service area located in the state of Illinois for the purpose of receiving universal service Lifeline support for the provision of broadband Internet access service ("BIAS" or "broadband").

¹See Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund, WC Docket Nos. 11-42, 09-197, 10-90, third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order) and Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (Lifeline Broadband Provider Guidance Public Notice).

I. <u>INTRODUCTION</u>

According to the Lifeline Modernization Order, the Commission has sole jurisdiction, pursuant to section 214(e)(6), to review and grant the Company's request for designation as an LBP ETC and, in that order, the Commission explicitly preempted state designation of broadband providers.² Petitions for LBP ETC designation will be deemed granted within sixty (60) days of the filing date for applicants that have provided BIAS to the public for at least two years and serve at least 1,000 non-Lifeline subscribers with voice telephony and/or BIAS as of the filing date.³ By this Petition, Madison requests LBP ETC designation in 827 census blocks located in the state of Illinois. Company meets all prerequisites for streamlined processing of this application under Section 54.202(d)(l) of the rules, and it respectfully requests such treatment.

As discussed in more detail below, Madison meets the requirements for designation as an LBP ETC and is able and prepared to offer the Lifeline-supported broadband service in the requested territory. Granting Madison's LBP ETC status will benefit the public interest by increasing the availability of quality broadband service offerings to a broad range of low-income consumers eligible for Lifeline benefits.

II. <u>ABOUT MADISON</u>

Madison is an affiliate of Madison Telephone Company, a privately owned rural local exchange company (RLEC) serving five exchanges in southwestern central Illinois and an eligible telecommunications carrier (ETC) with study area code (SAC) 341049. Together, the companies employ a total of 46 employees.

² See Lifeline Modernization Order ¶ 232.

³ See 47 C.F.R. § 54.202(d)(1).

Madison provides broadband internet service as well as video services for consumers inside the Madison Telephone exchanges as well as the neighboring towns of Bunker Hill, Shipman, Benld, Mt. Olive, Wilsonville, Alhambra, Moro, New Douglas, Mt. Clare and Sawyerville. Currently, Madison, as a facility-based provider, has the capability of providing broadband service of up to 10 Mbps downstream and 1 Mbps upstream in all service areas and up to a maximum downstream of 100 Mbps depending on technology type and customer location.

III. MADISON MEETS THE REQUIREMENTS FOR DESIGNATION OF LIFELINE BROADBAND PROVIDER

Sections 54.201 and 54.202 of the Commission's rules outline the requirements that must be met before the FCC can designate a carrier as an LBP ETC. As discussed in further detail below, Madison meets the requirements for designation as an LBP established in section 214(e) of the Act and sections 54.201 and 54.202 of the Commission's rules and therefore LBP ETC designation is warranted. Further, Madison qualifies for 60-day streamlined processing of this Petition.

A. Madison is a Well-Established Telecommunications and Broadband Provider

Madison and/or its affiliates have provided quality voice telecommunications service for over 70 years and broadband service for over twenty years to its customers in southwestern central Illinois.

B. Madison is a Facilities-Based Service Provider

Madison has a fiber and coaxial network throughout its service area that it uses to provide voice, video, and broadband services to its customers.

C. Madison will Comply with all Lifeline Broadband Service Requirements

Madison hereby certifies that it will provide service applicable to the support the Company receives, including the applicable minimum service standards for fixed broadband. Madison's

fixed broadband service exceeds the minimum standard of 10/1 Mbps and 250 Gbps per month of data. The Company also provides WiFi-enabled modems to its customers in accordance with the Commission's rules.

The Company understands that it must continue to comply with any future additions to or amendments of the Lifeline rules and will revise its offerings as necessary to comply, in the future, with updated service standards. For example, the Company will continue to offer plans that include qualifying BIAS throughout its designated service areas even as the minimum service standards for qualifying BIAS are updated annually by the Commission.

D. Madison will Advertise Lifeline Service in Media of General Distribution

Pursuant to Commission rule Section 54.201(d)(2), Madison will advertise the availability of the broadband services and the charges, which are described more fully below, using newspapers, social media, radio, websites, point of sale collateral and other media which are generally available in the proposed service area. The particular media will be selected to ensure that the projected recipients of Lifeline-supported broadband services are included in the audience.

E. Madison has the Ability to Remain Functional in Emergency Situations

Madison certifies that it has the ability to remain functional in emergency situations, has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Further, Title 83 Illinois Administrative Code Section 730.325 requires an ETC to complying with provisions to meet emergencies including but not limited to the provision of emergency power. Madison and its affiliates have implemented a redundant fiber optic ring allowing Madison the ability to reroute traffic around damaged facilities.

Specifically, each central office building is supplied with standby generators and battery

back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its remote node locations. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel.

F. Madison will Satisfy Applicable Consumer Protection and Service Quality Standards

Madison certifies that it understands its consumer protection obligations under the Communications Act and its implementing rules, and is prepared to comply with those obligations and any future amendments or additions thereto. Applicable consumer protection rules include, but are not limited to, any applicable rules regarding unjust or unreasonable practices, discrimination, and relevant enforcement provisions in the Act and the FCC's rules.

Madison also complies with the requirements of 47 C.F.R. Part 64 Subpart U, Customer Proprietary Network Information and Subpart Y, Truth in Billing Requirements for Common Carrier, and Federal Trade Commission "Red Flag" rules to prevent identity theft. A policy for CPNI and an Identity Theft Prevention Program is in place and employee training is conducted annually. New hires are instructed on the programs as required by their job functions.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in FCC 47 C.F.R. Part 8 §8.3.

G. Madison is financially and technically capable of providing Lifeline-supported broadband services in compliance with the Commission's rules

Commission rule 54.202(a)(4) requires ETC petitioners to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements. Madison provides telecommunications and broadband services as well as video services to non-Lifeline customers, and, therefore, will not be solely dependent on Lifeline subscribers for its revenues. Madison and/or its affiliates have provided voice telecommunications service for over seventy years and have provided broadband service for over twenty years. Madison currently has a subscriber base of over 3,800 subscribers. Consequently, the Company has access to sufficient funds to operate its business and is not solely dependent on reimbursement from the Lifeline Fund. Madison has not relied on support from any Lifeline or other USF mechanism to sustain its operations.

In addition, Madison has provided broadband internet service, using its own fiber and coaxial network since 1996, and therefore has the technical capability to provide Lifeline broadband services in accordance with the Commission's rules. The initiation of Lifeline service should add very little cost to Madison's current operations while permitting an expansion of supported services to additional customers. Madison is therefore fully financially and technically qualified to offer BIAS.

H. Terms and Conditions of Madison's Broadband Plans for Lifeline Subscribers

Madison will offer Lifeline customers the same broadband plans that are generally available to all customers. Below is a summary of the fixed broadband service plans that Madison will offer:

Speed Tier	Monthly Price	Data Usage
10 Mbps Download / 1 Mbps Upload	\$64.95	Unlimited
20 Mbps Download / 1 Mbps Upload	\$74.95	Unlimited
50 Mbps Download / 5 Mbps Upload	\$94.95	Unlimited
100 Mbps Download / 10 Mbps Upload	\$109.95	Unlimited

In addition, we offer the convenience and value of discounted broadband, video and voice double and triple play packaged bundles. Details of the rates, terms, and conditions for the broadband plans can be found at www.gomadison.com

IV. PROPOSED DESIGNATED SERVICE AREA

Madison will provide Lifeline-supported broadband service and will make the services available to all qualified consumers in its designated service area. Included as **Attachment A** is a list of 827 census blocks identifying the proposed designated service area for which Madison seeks designation as an LBP ETC to provide Lifeline-supported broadband services. These census blocks are not located within the Madison Telephone Company's service area, although some of them do overlap. In addition, Madison will provide a Microsoft Excel file listing the census blocks via electronic mail to the Bureau Staff.

V. OTHER LIFELINE OBLIGATIONS

Madison recognizes and accepts the obligation to abide by the Commission's rules regarding the provision of Lifeline service generally and BIAS service specifically. In particular, Madison understands that the National Lifeline Eligibility Verifier will be the enroller of Lifeline customers once it is operational in the Company's state, but until then, Madison is responsible for implementing and enforcing the Commission's verification, recordkeeping and

recertification requirements. Madison is aware of the Commission's current requirements regarding certification and verification of a customer's qualification for Lifeline service and will implement procedures to ensure the requirements are met. Madison also will check the applicant against the National Lifeline Accountability Database (NLAD), as well as its own duplicate checking system and will comply with the annual certification and reporting requirements as well as the Commission's measures to prevent waste, fraud and abuse of Lifeline services.

VI. MADISON QUALIFIES FOR STREAMLINED PROCESSING OF ITS LBP ETC DESIGNATION

The Commission's Lifeline Modernization Order, as reflected in new rule 54.202(d), provides a streamlined process for approving LBP ETC petitions where certain criteria are met. To qualify for LBP ETC designation, applicants must meet the ETC requirements of section 214(e) of the Act, and FCC rules 54.201 and 54.202. However, petitions for LBP ETC designation will be deemed granted, unless the Commission notifies the applicant otherwise, within sixty days of the submission of a complete petition if the filer demonstrates financial stability and experience in providing broadband service. To meet this showing, applicants must show that they have provided broadband Internet access or voice service to at least 1,000 non-Lifeline subscribers. In addition, the applicant must have offered broadband service, without interruption, for the two years prior to the filing date.

Madison meets all of the requirements for streamlined LBP ETC designation. As demonstrated in this petition, Madison meets all of the ETC requirements of section 214(e) of the Act, and FCC rules 54.201 and 54.202 and has been providing, without interruption, both voice telecommunications and broadband service to non-Lifeline customers since 1996. As of the date

of this filing, Madison serves over 3,800 non-Lifeline subscribers with broadband services. Accordingly, Madison meets all of the criteria for streamlined grant of its LBP ETC designation and expressly requests such treatment.

VII. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING LBP ETC STATUS TO MADISON

The Commission's rules require that, before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest.⁴ In determining if the public interest showing has been met in the context of voice Lifeline service, the Commission typically considers the benefits of consumer choice and the unique advantages and disadvantages of the applicant's service offering. These considerations should also apply to an LBP ETC designation public interest showing.

In the Lifeline Modernization Order, the Commission stated that, "much like telephone service a generation ago, broadband has evolved into the essential communications medium of the digital economy, continuing to transform the landscape of America even more rapidly and pervasively than earlier infrastructure networks" and that, "access to broadband shortens the distance to high-quality education, meaningful employment, and reliable healthcare. It is now the dominant technology used to communicate, educate, inform, and entertain." Further, the Commission referenced its 2015 Broadband Progress Report in its Lifeline Modernization Order, when it said that "Americans turn to broadband Internet access service for every facet of daily life, from finding a job to finding a doctor, from connecting with family to making new friends, from becoming educated to being entertained." However, the Commission has recognized that a

⁴ See 47 C.F.R. § 54.202(b).

⁵ Lifeline Modernization Order ¶ 12.

⁶ Id. ¶ 18.

"digital divide" still exists with low-income consumers adopting broadband at rates well below the rest of the country.⁷

Madison's broadband service will enable Lifeline-eligible subscribers to access the Internet for multiple tasks such as looking for jobs, online shopping, communicating with their children's schools, communicating with their work or family and friends by email and completing homework assignments. Granting Madison's Petition will enable the Company to provide Lifeline-eligible consumers with access to convenient and much-needed Internet access, thereby helping to bridge the digital divide. Moreover, Madison's Lifeline-supported broadband service plan is designed with disadvantaged consumers in mind and will help the Commission meet key Lifeline program goals, including closing the jobs and homework gaps and increasing competitive pressure to ensure that subscribers get high value for their Lifeline benefits. Further, entry of Madison to the Lifeline-supported broadband market will result in a source of quality broadband service that may spur other ETCs to offer competitive Lifeline broadband service offerings.

As of the date of this filing, Madison provides broadband telecommunications services to over 3,800 subscribers and has established detailed and comprehensive procedures to ensure service is provided in compliance with Lifeline requirements. Madison will leverage this experience and expertise to ensure its Lifeline-supported broadband services are offered in compliance with the Commission's rules, thereby eliminating waste, fraud and abuse of the Lifeline program. This proven track record, combined with an attractive offering of broadband packages ensures that the Company will provide more choices and more value for Lifeline eligible consumers. Accordingly, grant of this petition is in the public interest.

⁷ Id. ¶ 19.

VII. ANTI-DRUG ABUSE CERTIFICATION

Madison certifies that it or no party to this Petition is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

VIII. CONCLUSION

For the foregoing reasons, Madison asserts that grant of the instant Petition for Streamlined Designation as an LBP ETC is in the public interest and is warranted in accordance with Section 214(e)(6) of the Act.

Respectfully Submitted,

Kim Harber

Senior Vice President

Madison Communications, Inc.

PO Box 29

21668 Double Arch Road

Staunton, IL 62088

618-635-5000

Dated: January 18, 2017

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